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Attorneys for Defendant

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

DAPHNE LORREN,

Plaintiff,

v.

VANCOUVER CLINIC, INC., P.S.,

Defendant.

Civil No. C06-5023-RBL

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR
DISCLOSURE OF EXPERT
TESTIMONY**

STIPULATION

1. The parties, by and through their attorneys of record, hereby stipulate to extend the deadline for disclosure of expert testimony pursuant to Federal Rule of Civil Procedure (“FRCP”) 26(a)(2) from August 24, 2006 to 30 days after the Court rules on any dispositive motions or, in the alternative, January 5, 2007, whichever is later.

2. The extension of time is for good cause based on the parties' desire to avoid unnecessary expense and the waste of resources, and to promote judicial economy. The trial in this matter is scheduled to begin on February 20, 2007. The current deadline for expert testimony disclosure, August 24, 2006, is considerably more than the default 90 days before trial provided under FRCP 26(a)(2)(C). The parties agree that the completion of further discovery, and specifically the depositions currently scheduled for late September and early October in this matter, and dispositive motions, will enable the parties to assess whether expert testimony is necessary. The parties also agree that the extension of the expert testimony deadline should not require any extension of the trial date or other deadlines. The parties have already exchanged their FRCP 26(a)(1) initial disclosures and documents.

3. Dispositive motions are due no later than November 22, 2006. The parties agree that postponing any expert testimony disclosures until after the Court has the opportunity to consider and rule upon any dispositive motions, which may obviate the need for expert testimony, would further promote judicial economy and avoid unnecessary expense.

4. Counsel for plaintiff and defendant have conferred, and plaintiff's counsel consents to and joins in the requested extension.

DATED: August 22, 2006.

DOLAN GRIGGS LLP

STOEL RIVES LLP

/s/
Martin C. Dolan, WSBA No. 36112
Attorney for Plaintiff

/s/
Paul C. Buchanan, WSBA No. 24614
Katherine K. Rosenbaum WSBA No. 30065

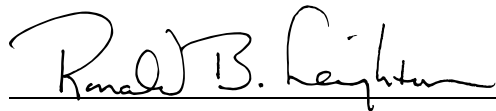
Attorneys for Defendant

ORDER

THIS MATTER came before the Court on the foregoing Stipulation of the parties. The Court has reviewed the parties' stipulation and, finding that the same is made for good cause, the Court hereby,

ORDERS that the deadline for disclosure of expert testimony shall be extended from August 24, 2006 to 30 days after the Court has ruled upon any dispositive motions filed by the parties or January 5, 2007, whichever is later.

IT IS SO ORDERED this 15th day of September, 2006.



RONALD B. LEIGHTON
UNITED STATES DISTRICT JUDGE

Presented by:

STOEL RIVES LLP

/s/

Paul C. Buchanan, WSBA No. 24614
Katherine K. Rosenbaum, WSBA No. 30065

Attorneys for Defendant

DOLAN GRIGGS LLP

/s/

Martin C. Dolan, WSBA No. 36112

Attorney for Plaintiff